

SEALED

UNITED STATES DISTRICT COURT

for the

Northern District of Texas

FILED

January 19, 2022

KAREN MITCHELL

CLERK, U.S. DISTRICT
COURT

United States of America
v.

Patricia Maldonado

Case No.

3:22-MJ-0047-BH

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 15, 2019 in the county of Dallas in the
Northern District of Texas, the defendant(s) violated:

Code Section

18 U.S.C. 2113(a)

Offense Description

Bank Robbery

This criminal complaint is based on these facts:

See attached affidavit of FBI SA Randall K. White.

☒ Continued on the attached sheet.



Complainant's signature

SA Randall K. White, FBI

Printed name and title

Agent sworn and signature confirmed via reliable electronic means, pursuant to Fed. R. Crim. P. 4.1.

Date: January 19, 2022



Judge's signature

City and state: Dallas, Texas

IRMA CARRILLO RAMIREZ, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF
APPLICATION FOR CRIMINAL COMPLAINT**

I, Randall K. White, a Special Agent with the Federal Bureau of Investigation (“FBI”), being first duly sworn, hereby depose and state as follows:

INTRODUCTION

1. I am a Special Agent with the FBI and have been since January 2011. During my training and since that time, I have received formal training from the FBI as well as training through contact with experts from various law enforcement agencies regarding bank robbery investigations, Hobbs Act robberies, and other violent crime related offenses. As a result of my training and experience, I am familiar with violations of federal laws pertaining to bank robbery and those who aid and abet robbers of commercial institutions in their criminal activity. Through my training and experience, I am familiar with techniques used to investigate such crimes. As a Federal Agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.

2. In preparation for this affidavit, I have discussed the facts of this case with other law enforcement agents and officers. The information contained in this affidavit is based on my personal knowledge, information I received from other law enforcement agents and officers assisting in this investigation, witnesses, and what I have learned from the other sources specifically discussed herein. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included every fact known to me concerning this investigation.

3. This affidavit sets forth facts establishing probable cause to believe that on or about November 15, 2019, in the Dallas Division of the Northern District of Texas, and elsewhere, Patricia **Maldonado** committed the offense of bank robbery, in violation of 18 U.S.C. § 2113(a).

PROBABLE CAUSE

1. The FBI is investigating a series of bank robberies which took place between October 22, 2019 and November 15, 2019 in Dallas, Texas in the Northern District of Texas.¹ As further described below, based on a report from a citizen who saw a news release on the bank robberies, and similarities in the suspect's appearance, clothing, and modus operandi, I believe that **Maldonado** has committed each of the described bank robberies.

I. Description of Bank Robberies

A. October 22, 2019 Robbery – Comerica Bank, Dallas, Texas

2. The first robbery occurred on October 22, 2019 at Comerica Bank, located at 2727 Fort Worth Ave., Dallas, Texas, in the Northern District of Texas. On that date, at approximately 10:54 a.m., a Hispanic female wearing a blue baseball cap, a gray zippered hoodie, khaki pants, black shoes, and heavy makeup entered the bank carrying a blue bank bag and displayed a note to the victim teller demanding that all the money from the teller drawer, with no dye packs or trackers, or she would pull out a gun. The teller gave the suspect \$815.60 in cash and the suspect fled the bank on foot. The suspect was

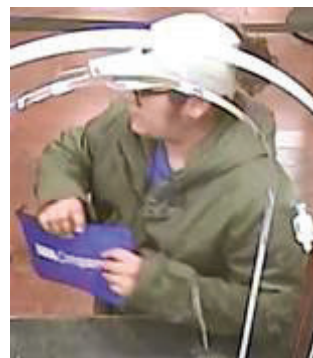
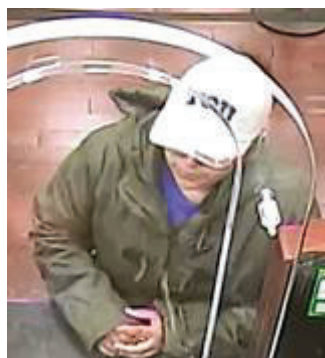
¹ Each of the victim financial institutions described below were insured, at all times relevant, by the Federal Deposit Insurance Corporation.

not apprehended.



B. November 5, 2019 Robbery – Chase Bank, Dallas, Texas

4. On November 5, 2019, at approximately 2:00 p.m., at Chase Bank, located at 6310 E. Mockingbird Ln., Dallas, Texas, in the Northern District of Texas, a Hispanic female wearing a white TCU baseball cap, a green jacket, khaki pants, and black shoes entered the bank carrying a blue bank bag and displayed a note to the victim teller demanding money and that the suspect had a gun. The teller gave the suspect \$1,782 in cash and the suspect fled the bank on foot. The suspect was not apprehended.



C. November 12, 2019 Robbery – Comerica Bank, Dallas, Texas

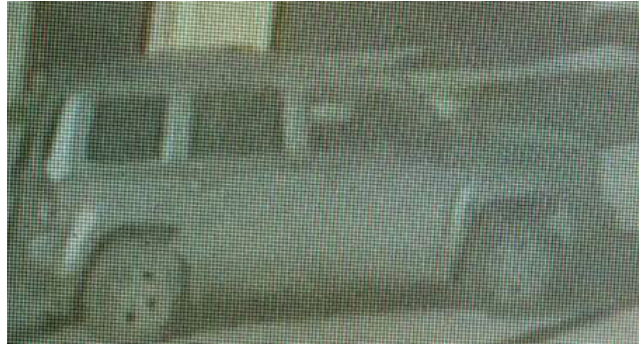
6. On November 12, 2019, at approximately 10:30 a.m., at Comerica Bank, located at 11155 Garland Road, Dallas, Texas, in the Northern District of Texas, a Hispanic female wearing a light-colored baseball cap, black jacket, and light colored pants, carrying a blue bank bag, entered the bank. The suspect approached the victim teller at the counter and produced a note demanding money. The teller gave the suspect \$390 in cash and the suspect fled the bank on foot. The suspect was not apprehended.



D. November 15, 2019 Robbery – Chase Bank, Dallas, Texas

8. On November 15, 2019, at approximately 3:00 a.m., at Chase Bank Bank located at 12900 Coit Rd., Dallas, Texas, in the Northern District of Texas, a Hispanic female wearing a black jacket with a large pink stripe, a khaki-colored baseball cap, and khaki pants, entered the bank. She approached the victim teller at the counter and produced a note demanding money and stating that the suspect had a gun. The teller gave the suspect \$1,000 in cash and the suspect fled the bank on foot. Surveillance footage showed the suspect walk to an Exxon gas station located next to the bank and enter a

silver in color Jeep Patriot and flee the area. The suspect was not apprehended.



II. Similarities between Bank Robberies

10. Based on similarities in the suspect's appearance and clothing across multiple robberies, including the same apparent blue bank bag being used; similarities in the suspect's modus operandi across multiple robberies, I believe that the same suspect has committed each of the above-described robberies and that **Maldonado**, as further detailed below, is that person.

III. Identification of Patricia Maldonado

11. The investigation to date has used social media accounts records, witness accounts, and law enforcement surveillance to link the suspect identified in the four (4) bank robberies offenses above. The investigation has developed evidence that the individual identified in the four (4) bank robberies is possibly Patricia **Maldonado**.

12. On November 20, 2019, a citizen who had observed a news release regarding the robbery suspect flagged down Dallas Police Sgt. P. Ralson #8679. The citizen did not have direct knowledge of the offense but had observed the pictures of the

unmasked suspect that had been released. The citizen believed that the suspect was Patricia **Maldonado**, a Hispanic female that was approximately 30 years old, who lived at 2930 Ramsey Ave. Dallas, TX 75216. The citizen stated that **Maldonado** did not have a vehicle of her own but was known to use a close family member's vehicle that he described as a silver Jeep. The citizen provided a Facebook picture (below left) of the person he knew as Patricia **Maldonado** (below left) that is located as a profile picture on the Facebook Account "Patricia Maldonado"

(<https://www.facebook.com/profile.php?id=100039131553171>).

13. Dallas Police Department Detective Stephen Prince was notified and began a check of the name Patricia **Maldonado** at the address 2930 Ramsey Avenue in the Dallas Police Department Record Management System "RMS." That check revealed two females by that name had provided that address in previous contacts with Law Enforcement. One was 53 years old (at the time of the offense). The other person had a birthdate of July 3, 1987 (32 years old at the time of the offense). A Texas Driver License check of Patricia **Maldonado**, date of birth 7/03/1987, revealed that her Texas ID Card ID #: 22499433; (picture below second from left) returned to 2930 Ramsey Avenue and listed her as 5'3", 149LBS, with brown hair and brown eyes. Investigators noticed immediate similarities in the appearance and physical description of Patricia **Maldonado** and the Robbery suspect (below second from right – ref: 10/22/19 Comerica Bank Robbery and below right – ref: 11/15/19 Chase Bank Robbery).



14. Investigative research into the Facebook Account revealed multiple related accounts. Investigators located a picture (below left) on the Facebook Account “Mayra Maldonado” (<https://www.facebook.com/mayra.maldonado.9809>) where it appears Patricia Maldonado is wearing the same sweatshirt as the suspect in the October 21, 2019 Comerica Robbery (Below Right)



15. Further investigation performed in Dallas PD RMS and the online investigative tool TLOxp regarding the address 2930 Ramsey Avenue Dallas, Texas revealed that Patricia’s sister Carolina Maldonado, (aka: Carolina Maldonado Espinosa; Date of Birth: 01/27/1984) had also been related to that address for multiple years. Further investigation revealed that Carolina Maldonado Espinosa owned a silver 2017 Jeep Patriot (Texas License Plate: JWW2370; VIN: 1C4NJPBA8HD145888) at the time of the robberies. Investigators located two pictures from October 2017 (below) on the

Facebook Account “Carolina Maldonado”

(<https://www.facebook.com/carolina.maldonado.902/timeline?lst=100004886705311%3A100000383741950%3A1574303695>) of Patricia **Maldonado** standing with the same Jeep Patriot and inside of it.



16. License Plate Reader activity (below) along with the Facebook pictures (above) revealed that the Jeep Patriot appeared to be similar in year, color, wheel design and model as the suspect vehicle (below right)



17. On November 21, 2019, members of the FBI Task Force and the Dallas Police Department Fugitive Unit who were operating in a covert capacity located the Jeep Patriot at its registered address: 657 Bow and Arrow Drive, Dallas, Texas 75224. Covert Elements observed the vehicle travel to 2930 Ramsey Road, Dallas, Texas.

18. On January 19, 2022, FBI Task Force Officers with the Dallas Police Department discovered that Patricia Maldonado had active warrants for her arrest and further investigation revealed that she was employed at GlassFloss Industries in Desoto, Texas. Officers went to that location and arrested Maldonado without incident.

19. On January 19, 2022, following her arrest on the warrants, FBI Agents were notified and they went to DPD to question her about the bank robberies. After having been Mirandized, Maldonado was questioned and shown four photos from the four bank robberies she was believed to have been involved in and she positively identified herself as the individual who was identified as the perpetrator of the four robberies, including the robbery that occurred at the Chase Bank on November 15, 2019.


CONCLUSION

4. Based on the facts set forth above, there is probable cause to believe that on or about November 15, 2019, in the Dallas Division of the Northern District of Texas, Patricia **Maldonado**, knowingly and intentionally committed a violation of 18 U.S.C. § 2113(a), that is, bank robbery, at Chase Bank located at 12900 Coit Road, Dallas, Texas, a locating within the Northern District of Texas.

A handwritten signature in blue ink, appearing to read 'Randall K. White', is written over a horizontal line.

Randall K. White
Special Agent
Federal Bureau of Investigations

Agent sworn and signature confirmed via reliable electronic means on January 19, 2022, pursuant to Fed. R. Crim. P. 4.1.

A handwritten signature in blue ink, appearing to read 'Irma Carrillo Ramirez', is written over a horizontal line.

HONORABLE IRMA CARRILLO RAMIREZ
UNITED STATES MAGISTRATE JUDGE
NORTHERN DISTRICT OF TEXAS